## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

JAMES MARABLE and KIM MARABLE, Plaintiffs, Case No. 3:12-cv-818 v. JURY DEMAND Q CARRIERS, INC. and MANSON T. WILLIAMS Judge Sharp Magistrate Judge Knowles Defendants. and STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY a/s/o JAMES W. AND KIM MARABLE, Plaintiff, v. MANSON T. WILLIAMS and SUMMIT EQUIPMENT LEASING, LLC,

## NOTICE TO TAKE VIDEOTAPE DEPOSITION <u>DUCES TECUM</u> OF DEFENDANT Q CARRIERS, INC. AND/OR SUMMIT EQUIPMENT LEASING, LLC'S RULE 30(b)(6) DESGINEE(S) REGARDING DRIVER TRAINING, OPERATIONAL SAFETY, AND INVESTIGATION OF ACCIDENTS

To: Clarence Risin, Esq.
V. Austin Shaver, Esq.
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
211 Commerce Street, Suite 800
Nashville, TN 37201

Samuel A. Baron, Esquire Law Office of Samuel A. Baron 1109 17<sup>th</sup> Avenue, S Nashville, TN 37212

Defendants.

Please take notice that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure,

Plaintiffs' counsel will take the video deposition of Defendant Q Carriers, Inc. and/or Summit

Equipment Leasing, LLC's Rule 30(b)(6) Designee(s) who is(are) to testify on behalf of said

Defendants regarding the following matters:

(1) Driver training;

(2) Operational safety; and

(3) Investigation of accidents.

Said deposition(s) shall be taken before a qualified court reporter at the offices of Scott

County Justice Center, Room GC-102, 200 4th Avenue W., Shakopee, Minnesota 55379 on

Wednesday, August 14, 2013 at 9:00 a.m. CDT.

The Deponent(s) is(are) to bring with them to their deposition the documents and things

identified in Exhibit A which is attached hereto.

This deposition will be conducted upon oral examination before a court reporter and will

be videotaped. This oral examination will continue from day to day until completed.

You are invited to attend and examine.

Respectfully submitted,

LAW OFFICES OF MORGAN G. ADAMS

BY: /S/MORGAN G. ADAMS

MORGAN G. ADAMS, BPR #013693

ATTORNEYS FOR PLAINTIFFS

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2

## CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon the following persons via the electronic filing system or U.S. Mail, postage prepaid, on this 27<sup>th</sup> day of June, 2013:

Clarence Risin, Esq. V. Austin Shaver, Esq. Baker, Donelson, Bearman, Caldwell & Berkowitz, PC P.O. Box 190613 Nashville, TN 37219

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Chaser Court Reporting 5841 190<sup>th</sup> Street East Minneapolis, MN 55372

/S/MORGAN G. ADAMS

JWC.c.Notice to Take Videotaped deposition of Designee.Marable.6.20.13.Rev.6.26.13.6.27.13